

Exhibit 15

July 29, 2021

UNITED STATES DISTRICT
SOUTHERN DISTRICT OF NEW YORK
Case No. 18-Civ. 12355

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SHABTAI SCOTT SHATSKY, individually
and as personal representative of the
Estate of Keren Shatsky, J ANNE
SHATSKY, individually and as personal
representative of the Estate of Keren
Shatsky, TZIPPORA SHATSKY SCHWARZ,
YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN,
MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY,
GINETTE LANDO THALER, individually and
as personal representative of the
Estate of Rachel Thaler, LEOR THALER,
ZVI THALER, ISAAC THALER, HILLEL
TRATTNER, RONIT TRATTNER, ARON S.
TRATTNER, SHELLEY TRATTNER, EFRAT
TRATTNER, HADASSA DINER, Yael
HILLMAN, STEVEN BRAUN, CHANA
FRIEDMAN, ILAN FRIEDMAN, MIRIAM
FRIEDMAN, YEHIEL FRIEDMAN, ZVI
FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

- against -

THE PALESTINE LIBERATION ORGANIZATION
and THE PALESTINE AUTHORITY(a/k/a "The
Palestinian Interim Self-Government
Authority" and/or "The Palestinian
National Authority"),
Defendants.

-----x

Videotaped Deposition of 30(b)(6)

Witness, FARID GHANNAM, (with all parties
participating remotely), on Thursday,
July 29, 2021, commencing at 7:33 a.m.,
before Roberta Caiola, a Professional Court
Reporter and a Notary Public.

July 29, 2021

A P P E A R A N C E S:

For the Plaintiffs:

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Also Present:

Mordechai Haller

Simek Shropshire, Paralegal

Cohen & Gresser

Arabic-Hadeer Al Amiri, The Interpreter

Corey Wainaina, The Videographer

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1 Farid Ghannam

2 THE VIDEOGRAPHER: Good

3 morning, everyone. We are now on the
4 record. Participants should be aware
5 that this proceeding is being
6 recorded and, as such, all
7 conversations held will be recorded,
8 unless there is a request and
9 agreement to go off the record.

10 This is the remote video
11 recorded deposition of Farid Ghannam.
12 Today is Thursday, July 29, 2021.
13 The time is now 11:32 UTC time. We
14 are here in the matter of Shatsky
15 versus PLO.

16 My name is Corey Wainaina,
17 remote video technician on behalf of
18 U.S. Legal Support, located at 90
19 Broad Street, New York, New York. I
20 am not related to any party in this
21 action, nor am I financially
22 interested in the outcome. At this
23 time, will the reporter, Roberta
24 Caiola, on behalf of U.S. Legal
25 Support, please enter the statement

July 29, 2021

1 Farid Ghannam
2 for remote proceedings into the
3 record.

4 THE COURT REPORTER: The
5 attorneys participating in this
6 deposition acknowledge that I am not
7 physically present in the deposition
8 room and that I will be reporting
9 this deposition remotely.

10 They further acknowledge that,
11 in lieu of an oath administered in
12 person, I will administer the oath
13 remotely, pursuant to executive order
14 number 202.7 issued by Governor Cuomo
15 on March 19, 2020.

16 The parties and their counsel
17 consent to this arrangement and waive
18 any objections to this manner of
19 reporting. Please indicate your
20 agreement by stating your name and
21 your agreement on the record.

22 MS. VINCZE: Eszter Vincze for
23 Cohen & Gresser. We represent
24 plaintiffs. We agree.

25 MR. BERGER: This is Mitchell

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1 Farid Ghannam
2 Berger, Squire Patton Boggs on behalf
3 of defendants, and we agree.

4 ARABIC-HADEER AL AMIRI, called as the
5 official interpreter, having been duly
6 sworn (by Roberta Caiola) to translate
7 questions from English to Arabic and
8 answers from Arabic to English, translated
9 as follows:

10 FARID GHANNAM, called as a witness, having
11 been duly sworn (through the interpreter)
12 by a Notary Public of the State of New
13 York, testified as follows:

14 MS. VINCZE: Before we begin
15 with Mr. Ghannam, just one
16 housekeeping measure. Since we are
17 here remotely during the COVID-19
18 pandemic, we would ask that
19 defendants confirm that, pursuant to
20 Rule 30(b)(4) of the Federal Rules of
21 Civil Procedure, that today's
22 deposition may be taken by video
23 conference as we're proceeding.

24 Pursuant to Rule 29, the
25 parties also stipulate that

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1 Farid Ghannam

2 Ms. Caiola is an appropriate officer
3 before whom this deposition may be
4 taken, even though the witness is in
5 Jordan and Ms. Caiola is located in
6 New York. Do we agree?

7 MR. BERGER: This is Mitchell
8 Berger on behalf of defendants. We
9 agree.

10 MS. VINCZE: Thank you.

11 EXAMINATION

12 BY MS. VINCZE:

13 Q. Good morning, Mr. Ghannam.
14 Thank you for coming here today. My name
15 is Eszter Vincze. I'm here representing
16 plaintiffs in this case and I will be
17 asking you some questions today and
18 tomorrow. Before I do so -- pardon?

19 (Pause in proceedings.)

20 -- I just want to go through
21 some ground rules so that you know what to
22 expect today.

23 Please state your name and
24 address for the record.

25 A. My name is Farid Ahmed Abed

July 29, 2021

1 Farid Ghannam

2 Hafez Ghannam. I live in Palestine,
3 Ramallah.

4 Q. What is your occupation and
5 title?

6 A. My occupation is the Deputy of
7 the Minister of Finance, and my title is
8 Al.

9 Q. Have you ever had your
10 deposition taken before?

11 A. No.

12 Q. So I'm going to go over the
13 process with you, so that we're all on the
14 same page. Is that all right?

15 A. Yes.

16 Q. Do you understand that you are
17 testifying under oath?

18 A. Yes.

19 Q. The court reporter will be
20 transcribing everything we say today. To
21 make sure that the record is accurate, and
22 especially since this deposition is taking
23 place via remotely, in light of the
24 COVID-19 pandemic, it is important that we
25 do not speak over each other, so that only

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1 Farid Ghannam

2 one person speaks at a time.

3 Please wait until I finish my
4 questions before you start answering them,
5 and I will wait until you finish your
6 answer before I ask another question. Is
7 that understood?

8 A. Yes.

9 Q. It is also important for you to
10 respond to questions verbally. For
11 example, nodding your head can't be
12 transcribed.

13 A. Yes.

14 Q. If you do not understand a
15 question, please let me know. I will try
16 to rephrase it for you. But, if you answer
17 a question, I will assume that you
18 understood my question. Okay?

19 A. Yes.

20 Q. Thank you. Now, your counsel
21 may object to my questions, but unless your
22 counsel instructs you not to answer a
23 question, you should go ahead and answer my
24 question, even though there was an
25 objection. Is that understood?

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1 Farid Ghannam

2 A. Yes.

3 Q. I may take periodic breaks
4 during the deposition. If you need a
5 break, please let me or your attorney know,
6 and I will do my best to accommodate your
7 request. However, if a question is
8 pending, I ask that you answer the question
9 first before we take a break. All right?

10 MR. BERGER: By counsel, before
11 he answers that, and consistent with
12 the local rules, he's going to say
13 yes for that, save for the exception
14 of any break we need to take to
15 confer over potential questions of
16 privilege before he answers. You may
17 answer.

18 Q. Do you remember the question,
19 Mr. Ghannam?

20 A. Yes.

21 Q. And, did you understand what I
22 had to say about breaks?

23 A. Yes.

24 Q. We're going to show you a lot
25 of documents today. If at any time you

July 29, 2021

1 Farid Ghannam

2 need to see more of the document than is on
3 the screen, then please let me know and we
4 will try to accommodate that. Okay?

5 A. Yes.

6 Q. Mr. Ghannam, do you speak
7 English?

8 A. I don't master English
9 speaking.

10 Q. Do you speak some degree of
11 English?

12 A. I cannot speak or express
13 myself in the English language.

14 Q. Do you understand English?

15 A. I don't speak the English
16 language well.

17 Q. Is there any reason you can't
18 testify truthfully today?

19 A. There is no reasons.

20 Q. Is there any reason you can
21 think of as to why you would not be able to
22 answer my questions today fully and
23 accurately?

24 A. There is no reasons.

25 Q. Now, when I ask you questions,

July 29, 2021

1 Farid Ghannam

2 I will be using shorthand for some terms.

3 For example, when I refer at times to

4 "defendants," I mean both the Palestinian

5 Authority and the Palestine Liberation

6 Organization. Do you understand?

7 A. Yes.

8 Q. And I will be referring to the

9 Palestinian Authority as the PA sometimes.

10 Do you understand that?

11 A. Yes.

12 Q. And I will be referring to the

13 Palestinian Liberation Organization as the

14 PLO sometimes. Do you understand that?

15 A. Yes.

16 Q. Thank you. Let's briefly

17 review your educational background. What

18 is your highest level of education?

19 A. The highest level of education

20 that I obtained is a master's degree in

21 financial science and banking, and now I'm

22 studying the Ph.D.

23 Q. And where did you receive that

24 master's degree?

25 A. In the Islamic University in

July 29, 2021

1 Farid Ghannam

2 Gaza.

3 Q. Where are you studying for your
4 Ph.D.?

5 A. Can you repeat the question?

6 THE INTERPRETER: This is the
7 interpreter. I will repeat the
8 question.

9 Q. Where are you studying for your
10 Ph.D.?

11 A. I registered in Morocco, in
12 Mohamed Al Khamis Universiti.

13 Q. Do you have any licenses, any
14 professional licenses?

15 A. Yes.

16 Q. What are those licenses?

17 A. A license in the financial
18 sciences and banking. Also, a license to
19 teach in the science, financial science in
20 the university.

21 Q. And do you teach at the
22 financial -- at the university?

23 A. I taught in Birzeit University
24 for four years, the financial science and
25 banking.

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1 Farid Ghannam

2 MR. BALOUL: This is an
3 objection to the translation. It's
4 not banking. It's accounting.

5 THE INTERPRETER: Accounting.

6 Q. What courses did you teach?

7 A. It's general financing.

8 Q. Do you have a bachelor's
9 degree?

10 A. Yes.

11 Q. Where is your bachelor's degree
12 from?

13 A. From Alexandria University from
14 Egypt.

15 Q. And when did you obtain that
16 bachelor's degree?

17 A. 1983.

18 Q. And when did you begin your
19 master's program?

20 A. I started studying for the
21 master's degree in 2002.

22 Q. And when did you obtain your
23 master's degree?

24 A. In 2006.

25 Q. Do you have any professional

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1 Farid Ghannam

2 certifications?

3 A. Other than the certificate
4 concerning the financial sciences and
5 accounting, I don't have any other
6 certificates.

7 Q. You have been designated to
8 testify on behalf of both the PA and the
9 PLO, correct?

10 A. Yes.

11 Q. Do you have a formal position
12 within the PA?

13 A. Deputy of the Finance, Minister
14 of Finance.

15 Q. Do you hold any other titles
16 within the PA?

17 A. I'm a member in multiple
18 organizations in the Palestinian Authority.

19 Q. What are those organizations?

20 THE INTERPRETER: This is the
21 interpreter. I'm going to ask the
22 respondent to say them one by one.

23 A. The Alliance for Industrial
24 Cities.

25 (Court reporter clarification.)

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1 Farid Ghannam

2 THE INTERPRETER: The Affairs
3 of Industrial Cities.

4 A. The Affairs of the Water
5 Authority. The Employment Palestinian
6 Authority.

7 Q. Is that -- are there any other
8 organizations of which you are a member
9 within the PA?

10 THE INTERPRETER: So this is
11 interpreter.

12 (Clarifying.)

13 A. The Finance Palestinian
14 Authority.

15 Q. Are there any other
16 organizations, besides the ones that you
17 have listed within the PA, of which you are
18 a member?

19 A. No.

20 Q. What do you do for the Alliance
21 for the Affairs of Industrial Cities?

22 A. I work as a member of the
23 regulatory committee in this institute.

24 Q. And what do you do for the
25 Affairs of the Water Authority?

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1 Farid Ghannam

2 A. The same function. A member in
3 the...

4 Q. A member in the what?

5 A. The same function. A member in
6 the organization's affair.

7 MS. VINCZE: This is a question
8 for the interpreter. Did he -- did
9 he say -- can you repeat what he said
10 to me again, please?

11 THE INTERPRETER: Yes, ma'am.

12 It's the same function. It's a
13 member in the organization affairs.

14 Q. What do you do in the
15 employment PA?

16 A. I work as a member in the
17 organization's committee.

18 Q. And what do you do for the
19 finance PA?

20 A. I'm a member in the
21 organization's committee.

22 Q. What is the Alliance of the
23 Affairs of Industrial Cities?

24 A. I work in the industrial cities
25 as a member.

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2 Mr. Ghannam?

3 A. Yes, I do.

4 MS. VINCZE: This is Exhibit
5 Number 1. For the record, this is
6 the 30(b)(6) Notice dated June 16,
7 2021.

8 MR. BERGER: Do you have an
9 Arabic translation?

10 MS. VINCZE: No.

11 Q. Do you recognize this document,
12 Mr. Ghannam?

13 A. Yes.

14 Q. What is it?

15 A. This document was presented to
16 me, translated into Arabic by the
17 attorneys, concerning some synonyms, and I
18 read it.

19 Q. When did you first see it?

20 A. I saw this document about a
21 month ago.

22 Q. And do I understand it
23 correctly that you were shown this document
24 by your attorneys?

25 A. Yes.

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1 Farid Ghannam

2 Q. Are you appearing today
3 pursuant to this notice?

4 A. Yes.

5 Q. Are you aware that you are here
6 to testify on behalf of the PA?

7 A. Yes.

8 Q. Who designated you to testify
9 on behalf of the PA?

10 A. The Minister of Finance.

11 Q. Are you aware that you are also
12 here to testify on behalf of the PLO?

13 A. Yes.

14 Q. Who designated you to testify
15 on behalf of the PLO?

16 A. The Minister of Finance.

17 Q. Have you read the deposition
18 topics on pages 2 through 3?

19 A. Yes.

20 Q. Topic 1 asks for testimony
21 regarding any payments made by defendants,
22 directly or indirectly, after April 18,
23 2020 to any individual -- pardon me --
24 payments made by defendants directly --
25 withdraw the question.

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2 martyrs, whether it's inside or outside,
3 goes through the Minister of Finance.

4 MR. BALOUL: Objection to --
5 this is Gassan Baloul. Objection to
6 the translation. He did not say
7 detainees. He said all payments,
8 period. No detainees.

9 THE INTERPRETER: This is the
10 interpreter. He said both.

11 (Cross-talk in Arabic.)

12 MR. BERGER: Why don't we have
13 him repeat the answer, and maybe this
14 time he'll give us a little bit more.

15 MS. VINCZE: Mr. Berger, I'm
16 going to repeat the question, and
17 then we will have the answer. All
18 right?

19 Q. Now, how do you have direct
20 knowledge of this topic?

21 A. All the payments that is made
22 to the families of the wounded and martyrs,
23 whether inside or outside, goes through the
24 Ministry of Finance.

25 MS. VINCZE: A quick question

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1 Farid Ghannam

2 kinds of support?

3 MR. BERGER: Objection,
4 ambiguous. You may answer if you
5 understand the question.

6 A. This establishment works
7 according to the law that governs the
8 health -- taking care of the family --
9 martyrs' families and wounded, and whatever
10 the laws say, the establishment works
11 according to that law.

12 Q. Does that include the 2016 law
13 that you mentioned previously?

14 A. Yes.

15 Q. How is the work of the Martyrs'
16 Family and Injured Care Establishment
17 funded?

18 A. From the general budget.

19 Q. And what is the source of the
20 funds allocated to it from the general
21 budget?

22 A. The general income that comes
23 from the taxes collected, directly and
24 indirectly, from the Palestinian
25 population.

July 30, 2021

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY,	-	-	-
individually and as)	Case No. 18-Civ. 12355	
personal representative)		
of the Estate of Keren)	VIRTUAL VIDEOTAPED	
Shatsky, J ANNE)	DEPOSITION OF FARID	
SHATSKY, individually)	GHANNAM, VOLUME II	
and as personal)	JULY 30, 2021	
representative of the)		
Estate of Keren)		
Shatsky, TZIPPORA)		
SHATSKY SCHWARZ, YOSEPH)		
SHATSKY, SARA SHATSKY)		
TZIMMERMAN, MIRIAM)		
SHATSKY, DAVID RAPHAEL)		
SHATSKY, GINETTE LANDO)		
THALER, individually)		
and as personal)		
representative of the)		
Estate of Rachel)		
Thaler, LEOR THALER,)		
ZVI THALER, ISAAC)		
THALER, HILLEL			
TRATTNER, RONIT			
TRATTNER, ARON S.			
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TRATTNER, HADASSA			
DINER, Yael HILLMAN,			
STEVEN BRAUN, CHANA			
FRIEDMAN, ILAN			
FRIEDMAN, MIRIAM			
FRIEDMAN, YEHIEL			
FRIEDMAN, ZVI FRIEDMAN,			
and BELLA FRIEDMAN,			

Plaintiffs,

against

July 30, 2021

1
2 THE PALESTINE
3 LIBERATION ORGANIZATION
4 and THE PALESTINIAN
5 AUTHORITY (a/k/a "The
6 Palestinian Interim
7 Self-Government
8 Authority" and/or "The
9 Palestinian National
10 Authority"),

11
12 Defendants.

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- - -

July 30, 2021

1 VIRTUAL VIDEOTAPED DEPOSITION OF FARID
2 GHANNAM, VOLUME II, witness herein, called by
3 the Plaintiffs, for examination, taken pursuant
4 to the Federal Rules of Civil Procedure, by and
5 before Kathy D. Landock, a Certified Realtime
6 Reporter and a notary public in and for the
7 Commonwealth of Pennsylvania, held remotely
8 with all parties appearing from their
9 respective locations, on Friday, July 30, 2021,
10 at 1133 UTC time.

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1 COUNSEL PRESENT:

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12 Joseph Alonzo, Esq.
Salim Kaddoura, Esq.
13 Gassan A. Baloul, Esq.
SQUIRE PATTON BOGGS
2550 M Street NW
14 Washington, DC 20037

15
16 ALSO PRESENT:

17 Corey Wainaina, Videographer
18 Hadeer Al-Amiri, Interpreter
Simek Shropshire
19 Mordechai Haller
20

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1 Q. Can you please page down to JD 87.

2 Mr. Ghannam, is it fair to say this
3 shows that Fatma Hamed Isma'il Masri has been
4 receiving payments on a monthly basis from
5 April 2020 through April 2021?

6 A. Yes.

7 Q. And she receives these payments as
8 the beneficiary of Izz al-Din Shuheil Ahmad
9 al-Masri; correct?

10 A. Yes.

11 Q. These payments are made from funds
12 under the control of the PA; correct?

13 A. Yes.

14 Q. Because all payments made to
15 qualifying beneficiaries of people designated
16 as martyrs are made from funds under the
17 control of the PA; correct?

18 MR. BERGER: Objection,
19 indefinite as to time.

20 BY MS. VINCZE:

21 Q. You may answer, Mr. Ghannam.

22 A. Yes.

23 Q. Thank you.

24 To your understanding, does Fatma
25 Hamed Isma'il Masri continue to receive these